

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA, :  
: :  
Plaintiff, :  
: :  
v. : Criminal Action No. 06-21-SLR  
: :  
JASON QUARLES, :  
: :  
Defendant. :  
:

**DEFENDANT'S UNOPPOSED MOTION FOR CONTINUANCE  
OF SENTENCING HEARING**

Defendant, Jason Quarles, by and through his undersigned counsel, Cathy A. Jenkins, hereby moves the Court for an Order continuing the Sentencing Hearing in this case.

In support of this motion, Mr. Quarles submits as follows:

1. On or about September 14, 2006, Mr. Quarles appeared before this Court and plead guilty to three counts of uttering counterfeit securities in violation of 18 U.S.C. § 513(a). Sentencing is currently set for June 12, 2007.

2. The matter was assigned to Christopher S. Koyste, Assistant Federal Public Defender, as trial counsel.

3. On June 1, 2007, Mr. Koyste resigned from the Federal Public Defender's Office. As such, Cathy A. Jenkins, Assistant Federal Public Defender, was assigned the case as trial counsel.

4. Because of the reassignment, Ms. Jenkins requires additional time to meet with Mr. Quarles and familiarize herself with the case to prepare for sentencing. Additionally, Ms. Jenkins also requires additional time to review the Presentence Report with Mr. Quarles and make comments and

objections, if necessary.

5. Accordingly, Mr. Quarles believes that, in the interests of justice, a continuance of the Sentencing Hearing is warranted.

6. Beth Moskow-Schnoll, Assistant United States Attorney, counsel for the government, does not oppose this request.

WHEREFORE, it is respectfully requested that this Court issue an Order continuing the Sentencing Hearing in this case for thirty (30) days.

Respectfully Submitted,

/s/  
Cathy A. Jenkins  
Assistant Federal Public Defender

Attorney for Defendant Jason Quarles

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Dated: June 8, 2007

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:

**ORDER**

Having considered Defendant's Unopposed Motion For Continuance Of Sentencing Hearing

**IT IS HEREBY ORDERED** this \_\_\_\_\_ day of \_\_\_\_\_, 2007, that  
Defendant Quarles' Sentencing Hearing shall be on the \_\_\_\_\_ day of \_\_\_\_\_, 2007,  
at \_\_\_\_\_ a.m./p.m.

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Honorable Sue L. Robinson  
United States District Court